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JASON EDWARD THOMAS CARDIFF
10

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
20
21
22

Case No. 5:23-cr-00021-JGB

**BRIEF REPLY IN SUPPORT OF
JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
EXTENDING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Declaration of
Stephen R. Cochell and [Proposed]
Order]*

1 **REPLY IN SUPPORT OF EX PARTE MOTION FOR AN ORDER**
2 **EXTENDING INTERNATIONAL TRAVEL AND RETURNING HIS**
3 **PASSPORT**

4 The Government’s opposition to Jason Cardiff’s Ex Parte Application for an
5 Order Extending International Travel is ill-informed and accuses counsel of filing a
6 motion about Mr. Cardiff’s medical condition without substantiation. Ironically,
7 AUSA Sebastian then asserts, *without substantiation*, that counsel has repeatedly
8 misquoted sources and transcripts making dishonest statements to the court. This
9 clearly violates the Court’s Civility and Professionalism Guidelines.¹

10 First, counsel did not dream up the names of the physicians identified as Mr.
11 Cardiff’s treating physicians. Moreover, counsel ignores the part of the Ex Parte
12 Application that describes the type of medical issues being experienced by Mr. Cardiff
13 and names of the treating physicians stating: “Counsel for Mr. Cardiff stands ready
14 to provide the Court with the correspondence and medical records supporting this
15 request.” Dkt. 125 at 3 (emphasis supplied). Secondly, AUSA Sebastian also argues
16 that, if electronic monitoring was removed, Mr. Cardiff would not return to the United
17 States. The record, however, shows that Mr. Cardiff has travelled domestically and
18 to Ireland and has complied with all court orders.

19 Simply stated, the unsupported allegations of dishonesty by Mr. Sebastian have
20 are wholly irrelevant and cast serious doubt as to whether AUSA Sebastian has lost
21 objectivity in this case.

22 The Court should disregard ad hominem attacks on counsel and grant the
23 application to extend Mr. Cardiff’s travel so that he can obtain the medical treatment
24 he needs.

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27 ¹ [https://www.cacd.uscourts.gov/attorneys/admissions/civility-and-professionalism-](https://www.cacd.uscourts.gov/attorneys/admissions/civility-and-professionalism-guidelines)
28 guidelines

1 Dated: November 15, 2024

3 By: /s/ Stephen R. Cochell

4 Stephen R. Cochell

5 Attorney for Defendant

6 JASON EDWARD THOMAS CARDIFF

8 **SERVICE LIST**

9 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
10 SERVED WITH THIS DEFENDANT JASON CARDIFF'S NOTICE OF MOTIO
AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT'S ECF O
11 NEXT GEN ELECTRONIC FILING SYSTEM:

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24 /S/ Stephen R. Cochell

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